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To: Federal Communications Commission

Re: RM-10807

Dear FCC,

I am in favor of this proposal. The facts presented make sense to me and the related conclusions appear to be valid. Their solution for dealing with the Morse requirement is to keep it as part of the testing process, but only as one component. Thus it would be possible for an individual to fail the Morse exam and still pass the exam, although he would need a very high score on the remaining parts to do so. I had to struggle a great deal with this but after a great deal of thought it seems to me that this is a quite fair way to keep Morse as part of the exam (because it is so very important) and yet not let it overwhelm the written test altogether.

I am also in favor of the changes to license class. The no-code technician class has been a very ineffective entry license. VHF/UHF privileges have simply not been enough to keep these individuals interested in Amateur Radio. They drop out soon after making a few repeater contacts on two meters. Most do not either upgrade or remain active because they only see the VHF/UHF side of Amateur Radio. Perhaps with more HF access, especially data access, they will find out the real magic in Amateur Radio that so many of us have seen. This, then, will spur their interest to greater activity and an interest in upgrading.

I also agree that there seems no real place for the Advanced class anymore. Consolidating it with the Extra makes sense.

CW still remains critical to Amateur Radio for a number of reasons. (1) It is still the method that gets through in poor conditions when other modes don't. Some will argue that data can get through better, but data requires more specialized equipment, including computers and this equipment may not be functional or available when there is a "real" emergency. CW equipment is very simple to build and operate and will "always" be the essential backup in times of emergency. (2) CW allows newcomers a means of building or buying cheap entry-level equipment for Amateur Radio. Low-income individuals, students and others now have a cheap way of getting on the air, if they know and use CW. For \$40 you can be on 40 meter CW. (3) CW equipment is simple to build and in an emergency you may be able to construct a CW transceiver from parts available. You simply are not going to be able to do this on other modes unless you are an accomplished engineer or equipment builder. (4) CW equipment is cheap to build and newer hams coming into Amateur Radio learn basic electronics and are often stimulated to advance their technical knowledge further.

If Amateur Radio were just a "hobby" there would be no justification in the FCC's eyes for its existence. You would simply turn those frequencies over to commercial and government interests. Amateur Radio exists because we fulfill the mission that is part of our charter. That mission, in part, is to (1) further the advance of the state of radio and electronics (2) advance the art of communications and (3) provide a pool of competent operators to act in times of emergencies.

For the reasons stated above CW is a critical part of Amateur Radio and must be part of the licensing process. Likewise giving some HF access to entry level licensees is necessary to fully acquaint these new hams to the magic the rest of us see. The technician license of the past decade has been a failure because few ever got involved in HF communications.

I think this proposal will provide meaningful changes to the licensing structure and assist new entry-level hams in becoming more active. I only have one change that I would like to add and that is that the actual exam questions and answers should not be published in advance of the exam. Let the VEC's publish "sample questions and answers that are similar. Too many people just memorize the actual questions and answers and it cheapens the exam.

Respectfully submitted,

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